

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

ARMADA MIDCONTINENT, LLC

DEBTOR

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**CASE NO. 15-41557
CHAPTER 7**

**REQUEST FOR EMERGENCY HEARING ON
EMERGENCY MOTION TO ALLOW TRUSTEE TO INCUR AND PAY EXPENSES
IN CONNECTION WITH THE PRESERVATION, MAINTENANCE, INSURANCE,
AND PROTECTION OF THE DEBTOR'S ASSETS**

TO THE HONORABLE BRENDA T. RHOADES, U. S. BANKRUPTCY JUDGE:

Linda Payne, the duly qualified and acting Trustee herein, files this Request for Emergency Hearing pursuant to Local Rule of Bankruptcy Procedure 9007(b) as follows:

I.

BACKGROUND

1. On August 28, 2015, Debtor filed its Voluntary Petition for relief under Chapter 7 of the United States Bankruptcy Court (the "Petition Date") and Linda Payne was appointed interim trustee of the estate.

2. The Trustee has filed an Emergency Motion to Allow Trustee to Incur and Pay Expenses in Connection with the Preservation, Maintenance, Insurance, and Protection of the Debtor's Assets (the "Motion to Incur").

III.

RELIEF REQUESTED

3. The Debtor's primary assets consist of working interests in oil and gas properties in Woodson County, Kansas, together with various operating equipment, general intangibles, accounts receivable, and any fixtures.

4. The Debtor has ceased operation of its oil and gas wells in Woodson County, Kansas, and is generating no revenues. The Trustee intends to market and sell the Debtor's assets, but in the interim requires authority from this Court to pay various preservation costs in order to preserve the value of the Debtor's assets through the date of the sale of the Debtor's assets.

5. The Trustee requests an emergency hearing on her Motion to Incur.

WHEREFORE, PREMISES CONSIDERED, Trustee requests an emergency hearing on the Emergency Motion to Allow Trustee to Incur and Pay Expenses in Connection with the Preservation, Maintenance, Insurance, and Protection of the Debtor's Assets. and such other and further relief to which she may be justly entitled.

Dated: September 16, 2015

Respectfully submitted,

THE MOORE LAW FIRM, L.L.P.

/s/ Bill F. Payne

BILL F. PAYNE, SBN 15649500

100 North Main Street

Paris, Texas 75460

Telephone 903-784-4393 or 972-628-4901

Facsimile 903-785-0312

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the attached mailing matrix either through the court's electronic notification system as permitted by Appendix 5005 to the Local Rules of the U.S. Bankruptcy Court for the Eastern District of Texas, or by first class United States Mail, postage prepaid on September 16, 2015.

/s/ Bill F. Payne
Bill F. Payne

Armada Midcontinent, LLC
5220 Spring Valley Rd
Suite 615
Dallas, TX 75254-2431

David Weitman
K&L Gates LLP
1717 Main Street
Suite 2800
Dallas, TX 75201-7342

Internal Revenue Service
Centralized Insolvency Operations
PO Box 7346
Philadelphia PA 19101-7346

Jennifer Klein Ayers
K&L GATES, LLP
1717 Main Street, Suite 2800
Dallas, TX 75201-7342

Linda S Payne
Chapter 7 Bankruptcy Trustee
12270 Coit Road, Suite 541
Dallas, TX 75251

Mark A. Weisbart
The Law Office of Mark A. Weisbart
12770 Coit Road, Suite 541
Dallas, TX 75251-1366

Prosperity Bank
3802 Oak Lawn Avenue
Dallas TX 75219-4614

U.S. Attorney General
Department of Justice
Main Justice Building
10th & Constitution Ave., NW
Washington, DC 20530-0001

United States Attorney's Office
110 North College Avenue, Suite 700
Tyler TX 75702-0204

US Trustee
Office of the U.S. Trustee
110 N. College Ave.
Suite 300
Tyler, TX 75702-7231